

CLERK
U.S. DISTRICT COURT
NEW JERSEY
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RONALD H. POSYTON, III
868 Carleton Road,
Westfield, New Jersey 07090

Plaintiff,

Vs.

ATLANTIC HEALTH SYSTEMS, INC.

Serve: Office of General Counsel
Sheilah O'Halloran, Esq.
475 South Street,
Morristown, New Jersey 07962

And

SUMMIT OAKS HOSPITAL, INC.

Serve: Amy Halley
Summit Oaks Hospital,
19 Prospect Street,
Summit, New Jersey 07901

And

GENE LUI
Overlook Medical Center,
99 Beauvoir Ave,
Summit, New Jersey 07901

And

CHARLES ROLAND
Overlook Medical Center,
99 Beauvoir Ave,
Summit, New Jersey 07901

And

ISIDORE KEIMAN
Summit Oaks Hospital,
19 Prospect Street,
Summit, New Jersey 07901

And

DAVID RAY
Summit Oaks Hospital,
19 Prospect Street,
Summit, New Jersey 07901

Defendants

Case No.: _____

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COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW, Ronald H. Posyton, III, proceeding *pro se*, seeking monetary compensation and declaratory judgement against the above-named *Defendants*, and in support thereof, alleges as follows:

INTRODUCTION

This action is brought pursuant to Title 42 U.S.C. 12101 *et seq.*; illegal seizure; false imprisonment; assault; battery; medical malpractice; among other things.

JURISDICTION AND VENUE

1. Jurisdiction is conferred on this Court pursuant to Title 28 U.S.C. §§ 1331, 1343, 1367, 1651, 2201, 2202.
2. Venue is proper pursuant to Title 28 U.S.C § 1391. *Defendants*, upon information and belief, are either residents, incorporated, or have jurisdictional affiliations in New Jersey.

PARTIES

3. *Plaintiff*, Ronald H. Posyton, III ("MR. POSYTON") is 21 years old, and a resident of New Jersey.
4. *Defendant*, Atlantic Health Systems, Inc. ("OVERLOOK") is a private corporation doing business as Overlook Medical Center.
5. *Defendant*, Summit Oaks Hospital, Inc. ("OAKS") is a private corporation and subsidiary of Universal Health Services, Inc.
6. *Defendant*, Gene Lui ("LUI") is a doctor who has affiliations with THE HOSPITAL.
7. *Defendant*, Charles Roland ("ROLAND") is a social worker who has affiliations with THE HOSPITAL.
8. *Defendant*, Isidore Keiman ("KEMIAN") is a doctor who has affiliations with THE ASYLUM.
9. *Defendant*, David Ray ("RAY") is a nurse who has affiliations with THE ASYLUM.

STATEMENT OF FACTS

10. On February 22, 2016, MR. POSYTON traveled to OVERLOOK.
11. While MR. POSYTON was waiting inside of OVERLOOK, a stranger, ROLAND, casually asked to speak with MR. POSYTON. Following ROLAND's brief conversation with MR. POSYTON, ROLAND decided that MR. POSYTON was going to be committed to a psychiatric hospital for the mentally insane.
12. MR. POSYTON demanded to be able to freely leave OVERLOOK. ROLAND told MR. POSYTON that if he were to leave OVERLOOK, the police officers that were stationed inside of OVERLOOK would capture him, and return his person to OVERLOOK.

1 13. MR. POSYTON has never hurt himself; MR. POSYTON has never hurt others; MR. POSYTON has never
2 developed thoughts about hurting himself; MR. POSYTON has never developed thoughts about hurting others.

3 14. MR. POSYTON had recently attained a 4.0 GPA at Union County College, and was currently studying
4 economics at Rutgers University in New Brunswick.

5 15. Nevertheless, ROLAND briefly phoned LUI, who affirmed ROLAND's decision.

6 16. MR. POSYTON began to faintly cry, and begged to be able to leave OVERLOOK. However, ROLAND
7 subsequently left, and MR. POSYTON was consequently imprisoned inside of OVERLOOK.

8 17. On February 23, LUI briefly spoke with MR. POSYTON. At the end of their conversation, LUI did not
9 release MR. POSYTON because he had diagnosed MR. POSYTON with, "Crazy."

10 18. On February 24, at approximately 2:00am, MR. POSYTON's person was transported to OAKS.

11 19. KEMAIN, who was assigned to be MR. POSYTON's doctor, refused to release MR. POSYTON's person.

12 20. MR. POSYTON asked KEMIAN, "Where's my due process?" KEIMAN responded, "You don't have any
13 due process, **I AM THE LAW.**"

14 21. On March 2, after having been imprisoned for 10 days, MR. POSYTON began to reasonably express that
15 the *Defendants* were depriving him of his Constitutional and Natural rights. RAY told MR. POSYTON that if he
16 continued to express his views, MR. POSYTON was going to be "medicated." After MR. POSYTON had refused to
17 stop advocating for his rights, RAY declared that he was going to inject MR. POSYTON with a slew of medications.
18 MR. POSYTON knelt down to the floor, placed his hands behind his head, and remained silent. MR. POSYTON
19 was then lifted to his feet, and RAY forced a slew of heavy sedative drugs into MR. POSYTON, which compelled
20 MR. POSYTON to sleep for the following two days.

21 22. Ultimately, MR. POSYTON hand wrote a seven page § 1983 complaint, and gave it to OAKS.

22 23. On March 8, MR. POSYTON appeared before the Honorable Court who visits OAKS every two weeks.
23 Following a roughly three minute hearing, the Court immediately released MR. POSYTON's person from OAKS.

24 24. Since MR. POSYTON had missed so much time at school, and even failed one class due to his lack of
25 attendance, MR. POSYTON he was forced to withdraw from Rutgers.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Title 42 U.S.C. § 12101 *et seq.*

Unjustified Institutionalization

(MR. POSYTON -vs- OVERLOOK & OAKS & LUI & ROLAND & KEIMAN)

25. *Defendants*, contrary to the form of the conduct, refused to accommodate MR. POSYTON with his freedom, which in effect, demonstrates a violation of the American with Disabilities Act.

SECOND CAUSE OF ACTION

Tort

Illegal Seizure

(MR. POSYTON -vs- OVERLOOK & LUI & ROLAND)

26. *Defendants*, contrary to the form of the conduct, illegally seized MR. POSYTON's person from the serenity of freedom without due process of law.

THIRD CAUSE OF ACTION

Tort

False Imprisonment

(MR. POSYTON -vs- OVERLOOK & OAKS & LUI & ROLAND & KEIMAN)

27. *Defendants*, contrary to the form of the conduct, detained and imprisoned MR. POSYTON's person inside of hospitals without due process of law.

FOURTH CAUSE OF ACTION

Tort

Assault

(MR. POSYTON -vs- OVERLOOK & OAKS & ROLAND & RAY)

28. *Defendants*, contrary to the form of the conduct, assaulted MR. POSYTON by placing him in a reasonable fear of imminent bodily harm.

FIFTH CAUSE OF ACTION

Tort

Battery

(MR. POSYTON -vs- OAKS & RAY)

29. *Defendants*, contrary to the form of the conduct, battered MR. POSYTON by forcing unnecessary drugs into his person.

SIXTH CAUSE OF ACTION

Tort

Medical Malpractice

(MR. POSYTON -vs- All Defendants)

30. *Defendants*, contrary to the form of the conduct, subjected MR. POSYTON to excessive medical treatment.

SEVENTH CAUSE OF ACTION

Tort

Intentional/Negligent/ Reckless Infliction of Severe Emotional Distress
(MR. POSYTON -vs- All Defendants)

31. *Defendant's* actions and omissions, contrary to the form of the conduct, subjected MR. POSYTON to suffer from severe emotion distress.

EPILOGUE

32. As the direct and proximate cause of the *Defendant's* wrongdoings, MR. POSYTON suffered injuries of body and mind; loss of a semester of schooling; adverse reputation; irreparable, tangible, and opportunity harm; humiliation; emotional distress, depression, and loss of enjoyment of life.

33. All wrongdoings and wrongdoers that were not mentioned are now cited in this paragraph.

PRAYER FOR RELIEF

34. MR. POSYTON repeats and re-alleges each and every allegation and idiom of the foregoing paragraphs as if fully set forth herein, and incorporates all past and future paragraphs and idioms as fully set forth *ab initio*.

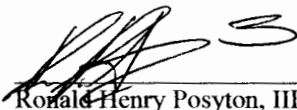
WHEREFORE, the *Plaintiff*, Ronald H. Posyton, III, prays that this Honorable Court enter judgment in his favor against the above named *Defendants*, jointly and severally, as follows:

- (1) For compensatory damages in the amount of \$10,000,000; or such an amount that shall be proven at trial;
- (2) For punitive damages to the fullest extent permitted by law;
- (3) For declaratory judgement decreeing, -
- The New Jersey Charitable Immunity Act does not apply to claims surrounding civil commitment;
- (4) For reasonable attorney, expert, counsel, and self-fees;
- (5) For Court costs, expenses, and interest;
- (6) For such other and further relief as this Honorable Court may deem just and proper;

Dated this 10th day of June 2016

DEMAND FOR JURY TRIAL

Respectfully submitted,
Under penalty of perjury,


Ronald Henry Posyton, III
Plaintiff, *pro se*
868 Carleton Road,
Westfield, New Jersey 07090
(908) 477-1238
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